



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DG
F. #2019R01319

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 11, 2022

By Email and ECF

Elizabeth E. Macedonio, Esq.
52 Duane Street
7th Floor
New York, NY 10007

Re: United States v. Pushpesh Kumar Baid, also known as “PK Jain”
Criminal Docket No. 21-367 (MKB)

Dear Ms. Macedonio:

On December 17, 2021, the government produced a hard drive containing the government’s fifth discovery production, Bates-Numbered DOJ-0000000001- DOJ-0001755854. As stated in the government’s December 17, 2021 discovery letter, the production consisted of documents that were contained in the government’s September 3, 2021 discovery production. The government made the December 17, 2021 production in order to correct a technical issue that affected the bates-numbering and ordering of documents in the September 3, 2021 production. Below please find an index of the documents contained in the December 17, 2021 production:

Description	Bates Range
Emails produced by the Investment Firm from accounts at the Company hosted by Zoho Corporation Pvt Ltd	DOJ-0000000001 - DOJ-0000390697
Documents produced by the Investment Firm and related to the Company from Ari Global Inc; Bank of America; Citibank NA; JP Morgan Chase NA; and individual RS.	DOJ-0000390698 - DOJ-0000416430
Documents produced by the Investment Firm (including documents re the defendant; documents re IP addresses; WhatsApp and text message communications; bank records regarding the Company; documents re transactions with the Company; contracts with the Company)	DOJ-0000416431 - DOJ-0000442733

Description	Bates Range
Bank records and spreadsheets summarizing and regarding same	DOJ-0000442734 - DOJ-0000445419
Recordings and draft transcripts of calls and meetings between 10/1/2019 and 10/14/2019	DOJ-0000445420 - DOJ-0000446624
Bank records and spreadsheets regarding same	DOJ-0000446625 - DOJ-0000446751
Screenshots from the Company's website	DOJ-0000446752 - DOJ-0000446779
Screenshots and images related to MSBs	DOJ-0000446780 - DOJ-0000447304
Records obtained from Bank of America	DOJ-0000447305 - DOJ-0000448108
Records obtained from Capital One	DOJ-0000448109 - DOJ-0000448219
Records obtained from Congressional Bank	DOJ-0000448220- - DOJ-0000455944
Records obtained from DocuSign	DOJ-0000455945 - DOJ-0000474037
Records obtained from International Financial Enterprise Bank	DOJ-0000474038 - DOJ-0000474184
Records obtained from Sun Trust Bank	DOJ-0000474185 - DOJ-0000474328
Documents produced by the Investment Firm	DOJ-0000474329

Description	Bates Range
	- DOJ-0000474621
Documents produced by the Investment Firms (including emails; documents re IP addresses; documents re transactions with the Company; information re buyers/sellers)	DOJ-0000474622 - DOJ-0000475704
Documents produced by the Investment Firm re civil lawsuits in Florida	DOJ-0000475705- - DOJ-0000475986
April 25, 2017 email from the defendant attaching presentation re the Company	DOJ-0000475987 - DOJ-0000476013
Documents produced by the Investment Firm re civil lawsuit in Nevada	DOJ-0000476014 - DOJ-0000476205
Documents produced by the Investment Firm obtained from individual RS (including Company financial documents)	DOJ-0000476206 - DOJ-0000476830
Complaint produced by the Investment Firm from civil litigation in Florida	DOJ-0000476831 - DOJ-0000477019
Documents produced by the Investment Firm: deposition transcripts and exhibits in civil litigation in Florida (including the defendant's May 28, 2020 deposition); powerpoint re bank statements	DOJ-0000477020 - DOJ-0000478953
Documents produced by the Investment Firm: deposition transcripts in civil litigation in Florida	DOJ-0000478954 - DOJ-0000479038
Cover letter from Investment Firm re documents bates-numbered DOJ-0000390698 - DOJ-0000416430	DOJ-0000479039 - DOJ-0000479040
Documents produced by the Investment Firm containing electronic records and communications.	DOJ-0000479041 - DOJ-0001755843

Description	Bates Range
Documents produced the Investment Firm related to the records hosted by Zoho and produced at DOJ-0000000001 - DOJ-0000390697	DOJ-0001755844 - DOJ-0001755854

If you have any questions regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ David Gopstein
David Gopstein
Assistant U.S. Attorney
(718) 254-6153

cc: Clerk of the Court (MKB) (by ECF)